

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**KATINA JACKSON AND EUGENE  
WIMBERLY,**

**Plaintiff,**

**vs.**

**FAMILY DOLLAR STORES OF TEXAS,  
LLC, D/B/A FAMILY DOLLAR STORE  
D/B/A FAMILY DOLLAR AND FAMILY  
DOLLAR**

**Defendants.**

**CIVIL ACTION NO. 3:21-cv-150**

**Jury Demand**

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**NOTICE OF REMOVAL**

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**TO THE HONORABLE UNITED STATES DISTRICT COURT FOR THE NORTHERN  
DISTRICT OF TEXAS:**

**I.  
COURT AND PARTY INFORMATION**

1. FAMILY DOLLAR STORES OF TEXAS, LLC (incorrectly named as "Family Dollar Stores of Texas, LLC, d/b/a Family Dollar Store d/b/a Family Dollar and Family Dollar") ("Defendant") is the defendant in a civil action commenced on December 15, 2020 in the 68<sup>th</sup> Judicial District of Dallas County, Texas, entitled *Katina Jackson and Eugene Wimberly v. Family Dollar Stores of Texas, LLC, d/b/a Family Dollar Store d/b/a Family Dollar and Family Dollar*, Cause No. DC-20-18451 ("State Court Action"). Copies of the (1) Plaintiffs' Original Petition and First Request for Discovery; (2) Citation to Family Dollar Stores of Texas, LLC; (3) Citation to Family Dollar; (4) Return of Service on for Family Dollar; (5) Return of Service for Family Dollar Stores of Texas, LLC; (6) Defendant's Original Answer and Request for

Disclosure; (7) Jury Demand; and (8) the Civil Docket Sheet are attached hereto and constitute all process, pleadings and orders served in the State Court Action. *See* Index of State Court Documents attached hereto. The address for the 68<sup>th</sup> Judicial District of Dallas County, Texas is as follows: George L. Allen, Sr. Courts Building, 600 Commerce Street, 5<sup>th</sup> Floor New Tower, Dallas, Texas 75202.

2. Plaintiffs in the State Court Action are Katina Jackson ("Plaintiff Jackson") and Eugene Wimberly ("Plaintiff Wimberly") (collectively "Plaintiffs"). Plaintiffs are represented by Winston B. Line (Texas Bar No. 24068698) of The Line Law Firm, PLLC, 4131 N. Central Expressway, Suite 932, Dallas, Texas 75204, (214) 821-2882, [winston@linelawfirm.com](mailto:winston@linelawfirm.com). Defendant Family Dollar Stores of Texas, LLC is the defendant in the State Court Action and is represented by Kenneth C. Riney (Texas Bar No. 24046721) and Clayton S. Carter (Texas Bar No. 24120750) of Kane Russell Coleman Logan, PC, 901 Main Street, Suite 5200, Dallas, Texas 75202, (214) 777-4200, [kriney@krcl.com](mailto:kriney@krcl.com), [ccarter@krcl.com](mailto:ccarter@krcl.com).

**II.**  
**STATE COURT ACTION**

3. Plaintiffs claim that on February 17, 2019, Plaintiff Jackson was injured when a box fell on her while she was standing in an aisle at the Family Dollar Store located at 4311 Live Oak Street., Dallas, Texas 75204.

4. Defendant requested a trial by jury in the State Court Action, and the jury fee has been paid.

**III.**  
**GROUNDS FOR REMOVAL**

5. Defendant files this Notice of Removal on the grounds of diversity jurisdiction under 28 U.S.C. § 1332(a). A suit may be removed from state court to federal court on the

grounds of diversity jurisdiction when the suit involves a controversy between citizens of different states and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

6. Except as otherwise expressly provided by an Act of Congress, any civil action brought in a state court of which the district courts of the United States have original jurisdiction may be removed to the district court of the United States for the district and division embracing the place where the action is pending. *See* 28 U.S.C. § 1441. The Dallas Division of the Northern District of Texas is the United States district and division embracing Dallas County, Texas, the county in which the State Court Action is pending.

**A. This Notice of Removal is timely filed.**

7. The citation and petition in this action were served on Defendant on December 23, 2020 by serving Defendant's registered agent. This Notice of Removal is filed within thirty (30) days of receipt of the citation and petition and is, therefore, timely filed pursuant to 28 U.S.C. § 1446(b).

**B. Complete diversity exists between the parties properly joined.**

8. This is a civil action that falls under the Court's original jurisdiction pursuant to 28 U.S.C. § 1332(a) and is one that may be removed to this Court based on diversity of citizenship in accordance with 28 U.S.C. §§ 1441 and 1446. Complete diversity exists in this case because Plaintiffs and Defendant are citizens of different states.

**(i) Plaintiffs**

9. As stated in Plaintiff's Original Petition, Plaintiff Jackson is a resident of Dallas County, Texas. Thus, Plaintiff Jackson is now and was at the time this action was commenced, a citizen of the State of Texas.

10. As stated in Plaintiff's Original Petition, Plaintiff Wimberly is a resident of Dallas County, Texas. Thus, Plaintiff Wimberly is now and was at the time this action was commenced, a citizen of the State of Texas.

**(ii) Defendant**

11. Defendant Family Dollar Stores of Texas, LLC is a limited liability company whose sole member is Family Dollar Stores of Ohio, Inc., a corporation formed under the laws of the Commonwealth of Virginia with its principal place of business now, and at the time this action was commenced, in Chesapeake, Virginia. Thus, Defendant Family Dollar Store of Texas, LLC is now and was at the time this action was commenced a citizen of the Commonwealth of Virginia and of no other state.

12. As Plaintiffs are both citizens of the State of Texas and not of the Commonwealth of Virginia, complete diversity exists pursuant to 28 U.S.C. § 1332.

**C. The amount in controversy requirement is satisfied.**

13. As reflected in Plaintiffs' Original Petition, the amount in controversy in this action, exclusive of interest and costs, exceeds the sum of \$75,000. Specifically, as explicitly stated in Plaintiffs' Original Petition, Plaintiffs seeks monetary relief over \$250,000 but not more than \$1,000,000. *See* Plaintiffs' Original Petition, ¶ I. Therefore, the estimate of damages that has been put at issue in this action by Plaintiffs and the amount in controversy in this action exceeds \$75,000.

14. Removal of the State Court Action is proper pursuant to 28 U.S.C. § 1441, because it is a civil action brought in a state court, and the federal district courts have original jurisdiction over the subject matter under 28 U.S.C. § 1332(a) because Plaintiffs and Defendant are diverse in citizenship.

**WHEREFORE**, Defendant, pursuant to these statutes and in conformance with the requirements set forth in 28 U.S.C. § 1446, removes this action for trial from the 68<sup>th</sup> Judicial District of Dallas County, Texas to this Court on this 22<sup>nd</sup> day of January, 2021.

Respectfully submitted,

**KANE RUSSELL COLEMAN LOGAN PC**

By: /s/ Kenneth C. Riney  
Kenneth C. Riney  
State Bar No. 24046721  
E-Mail: [kriney@krcl.com](mailto:kriney@krcl.com)  
Clayton S. Carter  
State Bar No. 24120750  
E-Mail: [ccarter@krcl.com](mailto:ccarter@krcl.com)

901 Main Street, Suite 5200  
Dallas, Texas 75202  
Telephone: (214) 777-4200  
Facsimile: (214) 777-4299

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this the 22<sup>nd</sup> day of January, 2021, a copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to counsel for Plaintiff by operation of the Court's electronic filing system, unless counsel for Plaintiff is not registered with the CM/ECF system, in which case the undersigned certifies that a copy of the foregoing document was sent to counsel for Plaintiff via certified mail, return receipt requested.

/s/ Kenneth C. Riney  
Kenneth C. Riney

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**KATINA JACKSON AND EUGENE  
WIMBERLY,**

**Plaintiff,**

**vs.**

**FAMILY DOLLAR STORES OF TEXAS,  
LLC, D/B/A FAMILY DOLLAR STORE  
D/B/A FAMILY DOLLAR AND FAMILY  
DOLLAR**

**Defendants.**

**CIVIL ACTION NO. \_\_\_\_\_**

**Jury Demand**

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**INDEX OF STATE COURT DOCUMENTS**

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| <b><u>DOCUMENT</u></b>   | <b><u>DATE</u></b> |
|--|--------------------|
| 1. Plaintiffs' Original Petition and First Request for Discovery | 12/15/2020         |
| 2. Citation to Family Dollar                                     | 12/21/2020         |
| 3. Citation to Family Dollar Stores of Texas, LLC                | 12/21/2020         |
| 4. Return of Service for Family Dollar                           | 12/30/2020         |
| 5. Return of Service for Family Dollar Stores of Texas, LLC      | 01/11/2021         |
| 6. Defendant's Original Answer and Request for Disclosure        | 01/12/2021         |

|    |                    |            |
|----|--------------------|------------|
| 7. | Jury Demand        | 01/22/2021 |
| 8. | Civil Docket Sheet |            |

NO. DC-20-18451

|  |                                   |
|--|-----------------------------------|
| <b>KATINA JACKSON and EUGENE WIMBERLY</b>  | § <b>IN THE DISTRICT COURT</b>    |
| <b>VS</b>  | §                                 |
| <b>FAMILY DOLLAR STORES OF TEXAS, LLC, d/b/a FAMILY DOLLAR STORE d/b/a FAMILY DOLLAR AND FAMILY DOLLAR</b> | § <b>C-68TH JUDICIAL DISTRICT</b> |
|  | §                                 |
|  | §                                 |
|  | § <b>DALLAS COUNTY, TEXAS</b>     |

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**PLAINTIFFS' ORIGINAL PETITION  
AND FIRST REQUEST FOR DISCOVERY**

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TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Plaintiffs, KATINA JACKSON and EUGENE WIMBERLY, complaining of Defendant, FAMILY DOLLAR STORES OF TEXAS, LLC, d/b/a FAMILY DOLLAR STORE d/b/a FAMILY DOLLAR, and FAMILY DOLLAR and for cause would show as follows:

I.

Pursuant to Texas Rules of Civil Procedure Rule 47, Plaintiffs seek monetary relief over \$250,000 but not more than \$1,000,000. Plaintiffs intend that discovery be conducted under Discovery Level II.

II.

Venue is proper in Dallas County, Texas because the accident made the basis of this suit occurred in Dallas County, Texas. Jurisdiction is proper because Plaintiffs seek to recover an amount within the jurisdictional limits of this Court.

III.

Plaintiff, KATINA JACKSON, is a resident of Dallas County, TX and holds:

SSN: XXX-XX-X055  
TDL: XXXXX144

Plaintiff, EUGENE WIMBERLY, is a resident of Dallas County, TX and holds:

SSN: XXX-XX-X736  
TDL: XXXXX726

Defendant, FAMILY DOLLAR STORES OF TEXAS, LLC, d/b/a FAMILY DOLLAR STORE d/b/a FAMILY DOLLAR, is a Texas Corporation with its principal place of business in Dallas County, Texas, and may be served as follows:

Family Dollar Stores of Texas, LLC  
c/o it's registered agent CORPORATION SERVICE COMPANY D/B/A  
CSC-LAWYERS INCO  
211 E. 7<sup>th</sup> Street Suite 620  
Austin, Texas 78701

Defendant, FAMILY DOLLAR, is a Texas Corporation or foreign corporation with principal place of business in Dallas County, Texas authorized to do business in Texas and may be served as follows:

Family Dollar  
c/o any officer, or person in charge of its local business at  
4311 Live Oak St  
Dallas, Texas 75204

#### IV.

On February 17, 2019, Katina Jackson, was injured at the Family Dollar located at 4311 Live Oak St, Dallas, TX 75204. Ms. Jackson was in the process of checking out when a heavy box filled with mouthwash bottles (or large bottles filled with liquid) fell on top of her next to the checkout aisle.

The store's security video shows boxes stacked on a dolly that were higher than the height of Ms. Jackson and leaning and leaning over. While reviewing the security video the store's manager and assistant manager stated the boxes were not stacked properly and looked like they were about to fall over. The manager and assistant manager also stated that they recognized the dangerous condition the day before Ms. Jackson was injured, and yet, they did nothing to address the dangerous condition.

The heavy box fell on Ms. Jackson's neck, shoulder, back, and hip causing her bodily injury. The plaintiff was injured and damaged as result of Defendants' negligence and gross negligence in one or more of the following regarding, among others:

1. Failing to discover an unreasonably dangerous condition on its premises;
2. Failing to properly warn of an unreasonably dangerous condition on its premises;  
and
3. Failing to make safe an unreasonably dangerous condition on its premises.

V.

At the time Plaintiff was injured at Defendants' store, she was a business invitee on Defendants' premises.

VI.

As a result of the incident made the basis of this suit, Plaintiff KATINA JACKSON has been injured and damaged in the past and in all reasonable probability will continue to be injured and damaged in the future in one or more of the following regards, among others, in excess of the minimum jurisdiction of this court:

- 1) Medical expenses;
- 2) Physical pain;
- 3) Mental anguish;
- 4) Impairment;
- 5) Loss of earning capacity.

As a result of the incident made the basis of this suit, Plaintiff EUGENE WIMBERLY, Ms. Jackson's husband, has been injured and damaged in the past and in all reasonable probability will continue to be injured and damaged in the future in one or more of the following regards, among others, in excess of the minimum jurisdiction of this court:

- 1) Loss of consortium;
- 2) Loss of household services;

3) Spousal nursing care.

VII.

As a result of Defendants' gross negligence, each Plaintiff is entitled to recover exemplary damages for which they further sue.

VIII.

A. Request for Disclosure

Pursuant to Rule 194 Texas Rules of Civil Procedure, DEFENDANTS are requested to produce to Plaintiff Katina Jackson's attorney, within 50 days of service hereof, the items and information set out in rule 194.2 Texas Rules of Civil Procedure.

B. Interrogatories

DEFENDANT, FAMILY DOLLAR STORES OF TEXAS, LLC, d/b/a FAMILY DOLLAR STORE d/b/a FAMILY DOLLAR, is hereby requested to answer, within fifty (50) days of service of this petition and incorporated request, the interrogatories attached hereto as "Exhibit A," separately, fully, in writing, and under oath, pursuant to Rule 197 of the Texas Rules of Civil Procedure, to the undersigned counsel of record for Plaintiff Katina Jackson.

C. Request for Production

All DEFENDANTS are hereby requested to produce, within fifty (50) days of service of this petition and incorporated request, the documents and tangible items in the list attached hereto as "Exhibit B," pursuant to Rule 196 of the Texas Rules of Civil Procedure, to the undersigned counsel of record for Plaintiff Katina Jackson.

D. Request for Admissions

All DEFENDANTS are hereby requested to produce, within fifty (50) days of service of this petition and incorporated request, the admissions attached hereto as "Exhibit C," pursuant to Rule 198 of the Texas Rules of Civil Procedure, to the undersigned counsel of record for Plaintiff Katina Jackson.

**PRAYER**

Wherefore, premises considered, Plaintiffs pray judgment of this court against Defendants for their actual damages, exemplary damages, costs of court, pre-judgment interest, post-judgment interest, and for such other and further relief, general or special, at law or in equity, as they may show themselves justly entitled.

Respectfully submitted,

**THE LINE LAW FIRM, PLLC**  
4131 N. Central Expressway Suite 932  
Dallas, Texas 75204

Phone: Tel. 214-821-2882  
Fax. 214-821-2191  
Email: [winston@linelawfirm.com](mailto:winston@linelawfirm.com)

By:

  
Winston B. Line, Attorney at Law  
SBN: 24068698

“EXHIBIT A”

PLAINTIFF KATINA JACKSON’S FIRST SET OF INTERROGATORIES TO  
DEFENDANTS

1. Please identify the individual providing answers to these interrogatories, to include all of the following identification information: (a) Full legal name and any other names you have used; (b) Current driver’s license and/or state ID number, including type, state of issuance, and restrictions, if any; (c) Address(es) for the past five (5) years, giving the street, street number, city, state, zip code, and foreign country.
2. Identify all individuals at the scene of this accident that checked on Plaintiff after she was injured.
3. Identify all individuals that touched, moved, stacked, or interacted with the boxes referred to in Plaintiffs’ Original Petition.
4. Who owned the store where the accident made the basis of this suit occurred?
5. Who had control of the premises where the accident made the basis of this suit occurred?
6. Identify all employees that worked at the Family Dollar made the basis of this suit the day before and the day of the accident. Please provide names, telephone numbers, and addresses for each employee.
7. List all employees, including store employees, store assistant-managers, store managers, and regional managers who discuss or communicated any details regarding the accident made the basis of this suit, to include names, telephone numbers, and addresses.

“EXHIBIT B”

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION TO DEFENDANTS

1. Produce color copies of all photographs, slides, videotapes, audiotapes, charts or drawings that relate in any way to the subject matter of this lawsuit, including but not limited to photographs of the scene of the accident and surveillance videos. (Note: for any items requested to be produced in color, digital files may be sent to the e-mail address of counsel for Plaintiff, which is [winston@linelawfirm.com](mailto:winston@linelawfirm.com), in order to save color copy costs)
2. Produce a copy of your certificate of occupancy.
3. Produce copies of any witness statements, written or electronically transcribed, that are relevant to the accident in question that are not privileged by law.
4. Produce all accident reports relating the accident made the basis of this suit.
5. Produce all documents given to employees of Family dollar that relate to stacking boxes and/or storing boxes in the store.
6. Produce all instructional material, policies, and safety material involving how boxes are stored, including all materials provided by Defendants and any third parties.
7. Produce all videos showing where the accident made the basis of this suit occurred for the 24 hours prior to this accident as well as the day of this accident.
8. Produce employment records for all employees who worked at the store made the basis of this suit. This is restricted to all employees who were present the day before and the day of the accident made the basis of this suit.
9. Produce all employment manuals and safety manuals provided to Family Dollar employees.

“EXHIBIT C”

PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS TO DEFENDANTS

ADMISSION NO. 1: Admit that you, the Defendant, were aware that the boxes made the basis of this suit could fall if not properly positioned.

ADMISSION NO. 2: Admit that the Defendant received a spoliation letter from Plaintiff.

ADMISSION NO. 3: Admit that the negligence of one or more of Defendant's employees was the sole proximate cause of the accident made the basis of this suit.

ADMISSION NO. 4: Admit that store employees were aware of the dangerous condition made the basis of this suit the afternoon before this accident.

ADMISSION NO. 5: Admit that store employees were aware of the dangerous condition made the basis of this suit the morning before the accident.

ADMISSION NO. 6: Admit that store employees failed to remediate the dangerous condition prior to the accident made the basis of this suit.

ADMISSION NO. 7: Admit that store employees failed to warn of the unreasonably dangerous condition made the basis of this suit.

ADMISSION NO. 8: Admit that the entire accident made the basis of this suit was caught on the store's surveillance cameras.

ADMISSION NO. 9: Admit that the store's video cameras videoed the stacking of the boxes prior the accident made the basis of this suit.

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

To: **FAMILY DOLLAR  
BY SERVING ANY OFFICER, OR PERSON IN CHARGE OF ITS LOCAL BUSINESS AT  
4311 LIVE OAK ST.  
DALLAS, TX 75204**

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written Answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **petition**, a default judgment may be taken against you. Your answer should be addressed to the clerk of the **68th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **KATINA JACKSON**

Filed in said Court **15th day of December, 2020** against

**FAMILY DOLLAR STORES OF TEXAS, LLC**

For Suit, said suit being numbered **DC-20-18451**, the nature of which demand is as follows:

Suit on **PROPERTY** etc. as shown on said petition **REQUEST FOR DISCLOSURE, PRODUCTION, ADMISSIONS AND INTERROGATORIES**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.  
Given under my hand and the Seal of said Court at office this 21st day of December, 2020.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By

*Carlenia Boulieny*  
CARLENIA BOULIGNY



**ATTY**

**CITATION**

**DC-20-18451**

**KATINA JACKSON, et al**

**Vs.**

**FAMILY DOLLAR STORES OF TEXAS,  
LLC, et al**

ISSUED THIS  
**21st day of December, 2020**

**FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas**

By: CARLENIA BOULIGNY, Deputy

**Attorney for Plaintiff  
WINSTON B. LINE  
THE LINE LAW FIRM  
4131 N CENTRAL EXPWY #932  
DALLAS TX 75204  
214-821-2882  
winston@linelawfirm.com**

**DALLAS COUNTY CONSTABLE  
FEES  
PAID**

**FEES NOT  
PAID**

### OFFICER'S RETURN

Case No. : DC-20-18451

Court No.68th District Court

Style: KATINA JACKSON, et al

Vs.

FAMILY DOLLAR STORES OF TEXAS, LLC, et al

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_.M. Executed at  
\_\_\_\_\_, within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_.M. on the  
\_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, by delivering to the within named  
\_\_\_\_\_  
\_\_\_\_\_

Each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery.  
The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_

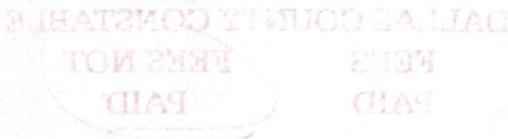
For Notary \$ \_\_\_\_\_ by \_\_\_\_\_ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,

To certify which witness my hand and seal of office.

\_\_\_\_\_  
Notary Public \_\_\_\_\_ County \_\_\_\_\_



**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To: FAMILY DOLLAR STORES OF TEXAS, LLC d/b/a FAMILY DOLLAR STORE  
d/b/a FAMILY DOLLAR  
BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY  
d/b/a CSC-LAWYERS INCO  
211 E 7TH STREET SUITE 620  
AUSTIN TX 78701**

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written Answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **petition**, a default judgment may be taken against you. Your answer should be addressed to the clerk of the **68th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **KATINA JACKSON**

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Given under my hand and the Seal of said Court at office this 21st day of December, 2020.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Carlenia Bouligny*  
CARLENIA BOULIGNY



**ATTY  
CITATION**

**DC-20-18451**

**KATINA JACKSON, et al  
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Clerk District Courts,  
Dallas County, Texas**

**By: CARLENIA BOULIGNY, Deputy**

**Attorney for Plaintiff  
WINSTON B. LINE  
THE LINE LAW FIRM  
4131 N CENTRAL EXPWY #932  
DALLAS TX 75204  
214-821-2882  
winston@linelawfirm.com**

**DALLAS COUNTY CONSTABLE  
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\_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, by delivering to the within named  
\_\_\_\_\_  
\_\_\_\_\_

Each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery.  
The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_

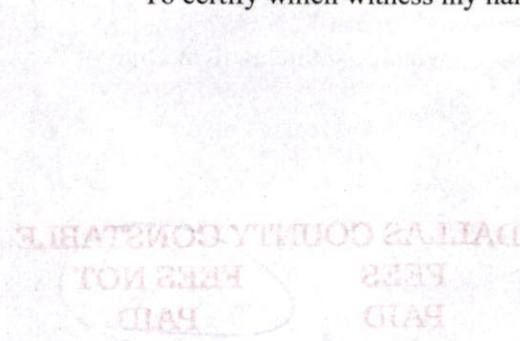
For Notary \$ \_\_\_\_\_ by \_\_\_\_\_ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,

To certify which witness my hand and seal of office.

Notary Public \_\_\_\_\_ County \_\_\_\_\_



**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To: FAMILY DOLLAR  
BY SERVING ANY OFFICER, OR PERSON IN CHARGE OF ITS LOCAL BUSINESS AT  
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By

*Carlenia Bouiligny*  
CARLENIA BOUILIGNY



**ATTY**

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21st day of December, 2020**

**FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas**

**By: CARLENIA BOUILIGNY, Deputy**

**Attorney for Plaintiff  
WINSTON B. LINE  
THE LINE LAW FIRM  
4131 N CENTRAL EXPWY #932  
DALLAS TX 75204  
214-821-2882  
winston@linelawfirm.com**

**DALLAS COUNTY CONSTABLE**

**FEES  
PAID**

**FEES NOT  
PAID**

### OFFICER'S RETURN

Case No. : DC-20-18451

Court No.68th District Court

Style: KATINA JACKSON, et al

Vs.

FAMILY DOLLAR STORES OF TEXAS, LLC, et al

Came to hand on the 18 day of December, 2020, at 8:30 o'clock A M. Executed at 4511 Live Oak St. Dallas, TX 75204, within the County of Dallas at 2:05 o'clock P M. on the 18 day of December, 2020, by delivering to the within named Family Dollar by serving any officer or person in charge of its local business at 4511 Live Oak St. Dallas, TX 75204 through Debra A. Arias Morning Shift manager.

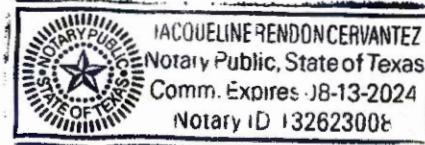
Each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ 75.00  
For mileage \$ \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_  
For Notary \$ \_\_\_\_\_ by BS 16034 12-31-2020 Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said John Buford Jr before me this 29 day of December, 2020.  
To certify which witness my hand and seal of office.

Notary Public Jacqueline Rendon County TX



**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To: FAMILY DOLLAR STORES OF TEXAS, LLC d/b/a FAMILY DOLLAR STORE  
d/b/a FAMILY DOLLAR  
BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY  
d/b/a CSC-LAWYERS INCO  
211 E 7TH STREET SUITE 620  
AUSTIN TX 78701**

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written Answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Your answer should be addressed to the clerk of the 68th District Court at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **KATINA JACKSON**

Filed in said Court **15th day of December, 2020** against

**FAMILY DOLLAR STORES OF TEXAS, LLC**

For Suit, said suit being numbered **DC-20-18451**, the nature of which demand is as follows:

Suit on **PROPERTY** etc. as shown on said petition **REQUEST FOR DISCLOSURE, PRODUCTION, ADMISSIONS AND INTERROGATORIES**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.  
Given under my hand and the Seal of said Court at office this 21st day of December, 2020.

**ATTEST:** FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By

*Carlenia Bouiligny*  
CARLENIA BOUILIGNY



**ATTY**

**CITATION**

**DC-20-18451**

**KATINA JACKSON, et al  
Vs.  
FAMILY DOLLAR STORES OF TEXAS,  
LLC, et al**

**ISSUED THIS  
21st day of December, 2020**

**FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas**

**By: CARLENIA BOUILIGNY, Deputy**

**Attorney for Plaintiff  
WINSTON B. LINE  
THE LINE LAW FIRM  
4131 N CENTRAL EXPWY #932  
DALLAS TX 75204  
214-821-2882  
winston@linelawfirm.com**

**DALLAS COUNTY CONSTABLE  
FEES PAID** FEES NOT PAID

## OFFICER'S RETURN

Case No. : DC-20-18451

Court No.68th District Court

Style: KATINA JACKSON, et al

Vs.

FAMILY DOLLAR STORES OF TEXAS, LLC, et al

Came to hand on the 23 day of December, 20 20, at 9:00 o'clock A.M. Executed at  
211 E 7th St, #620, Austin, TX, within the County of Travis at 8:00 o'clock A.M. on the  
31 day of December, 20 20, by delivering to the within named

Family Dollar Stores of Texas, LLC d/b/a Family Dollar Store d/b/a Family Dollar by  
serving Registered Agent Corporation Service Company by CMRRR(7018-3090-0000-5972-2146)

Each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery.

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

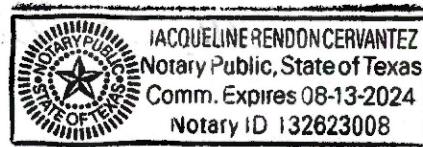
|                      |              |
|----------------------|--------------|
| For serving Citation | \$ <u>75</u> |
| For mileage          | \$ <u>0</u>  |
| For Notary           | \$ <u>0</u>  |

of \_\_\_\_\_ County,  
by Heather Bork PSC#8153 Deputy

(Must be verified if served outside the State of Texas. Exp 2/28/22)

Signed and sworn to by the said Heather Bork before me this 07 day of January, 20 21,  
To certify which witness my hand and seal of office.

Notary Public Dallas County TX



|   |   |  |  |  |   |  |   |  |  |   |   |  |  |  |   |                                       |  |   |  |
|---|---|--|--|--|---|--|---|--|--|---|---|--|--|--|---|---------------------------------------|--|---|--|
| <b>SENDER: COMPLETE THIS SECTION</b>  |   | <b>COMPLETE THIS SECTION ON DELIVERY</b>   |  |  |   |  |   |  |  |   |   |  |  |  |   |                                       |  |   |  |
| <ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>  |   | <p>A. Signature <i>KK AAO</i></p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>12/81/20</i></p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes<br/>If YES, enter delivery address below: <input type="checkbox"/> No</p>  |  |  |   |  |   |  |  |   |   |  |  |  |   |                                       |  |   |  |
| <p>1. Article Addressed to:<br/> <b>Family Dollar Stores of Texas</b><br/> <b>CORPORATION SERVICE COMPANY</b><br/> <b>211 E. 7th STREET., #620</b><br/> <b>AUSTIN, TEXAS 78701</b><br/> <br/> <b>9590 9402 4972 9063 4048 11</b></p> <p>2. Article Number (Transfer from service label)<br/> <b>7018 3090 0000 5972 2146</b></p> |   | <p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td>Insured Mail Restricted Delivery<br/>(for \$500)</td> <td></td> </tr> </table> |  | <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® | <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ | <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery | <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ | <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery | <input type="checkbox"/> Insured Mail |  | Insured Mail Restricted Delivery<br>(for \$500) |  |
| <input type="checkbox"/> Adult Signature  | <input type="checkbox"/> Priority Mail Express®                     |  |  |  |   |  |   |  |  |   |   |  |  |  |   |                                       |  |   |  |
| <input type="checkbox"/> Adult Signature Restricted Delivery  | <input type="checkbox"/> Registered Mail™                           |  |  |  |   |  |   |  |  |   |   |  |  |  |   |                                       |  |   |  |
| <input type="checkbox"/> Certified Mail®  | <input type="checkbox"/> Registered Mail Restricted Delivery        |  |  |  |   |  |   |  |  |   |   |  |  |  |   |                                       |  |   |  |
| <input type="checkbox"/> Certified Mail Restricted Delivery   | <input type="checkbox"/> Return Receipt for Merchandise             |  |  |  |   |  |   |  |  |   |   |  |  |  |   |                                       |  |   |  |
| <input type="checkbox"/> Collect on Delivery  | <input type="checkbox"/> Signature Confirmation™                    |  |  |  |   |  |   |  |  |   |   |  |  |  |   |                                       |  |   |  |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery  | <input type="checkbox"/> Signature Confirmation Restricted Delivery |  |  |  |   |  |   |  |  |   |   |  |  |  |   |                                       |  |   |  |
| <input type="checkbox"/> Insured Mail   |   |  |  |  |   |  |   |  |  |   |   |  |  |  |   |                                       |  |   |  |
| Insured Mail Restricted Delivery<br>(for \$500)   |   |  |  |  |   |  |   |  |  |   |   |  |  |  |   |                                       |  |   |  |

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

## CAUSE NO. DC-20-18451

|   |   |                                    |
|---|---|------------------------------------|
| KATINA JACKSON AND EUGENE<br>WIMBERLY,  | § | IN THE DISTRICT COURT              |
| Plaintiffs,   | § |                                    |
| vs.   | § | DALLAS COUNTY, TEXAS               |
| FAMILY DOLLAR STORES OF TEXAS,<br>LLC, D/B/A FAMILY DOLLAR STORE<br>D/B/A FAMILY DOLLAR AND<br>FAMILY DOLLAR, | § |                                    |
| Defendants.   | § | 68 <sup>TH</sup> JUDICIAL DISTRICT |

**DEFENDANT FAMILY DOLLAR STORES OF TEXAS, LLC'S  
ORIGINAL ANSWER AND REQUEST FOR DISCLOSURE**

COMES NOW FAMILY DOLLAR STORES OF TEXAS, LLC (incorrectly named as "Family Dollar Stores of Texas, LLC, d/b/a Family Dollar Store d/b/a Family Dollar and Family Dollar") ("Defendant Family Dollar") and files this, its Original Answer and Request for Disclosure and, in support thereof, would show the Court as follows:

**I.  
GENERAL DENIAL**

Defendant Family Dollar places in issue all matters contained in Plaintiffs' Original Petition and any amendments thereto, by general denial, pursuant to Rule 92 of the Texas Rules of Civil Procedure.

**II.  
JURY DEMAND**

Defendant Family Dollar respectfully demands a trial by jury.

**III.**

Defendant Family Dollar asserts that the alleged dangerous condition was open and

obvious and/or known to Plaintiff Katina Jackson ("Plaintiff Jackson").

**IV.**

Defendant Family Dollar asserts that Plaintiff Jackson was negligent with respect to the occurrence in question and that her negligence, fault, assumption of the risk, acts and/or omissions were the sole proximate cause, or in the alternative, a contributing proximate cause of this occurrence and Plaintiffs' damages, if any.

**V.**

Defendant Family Dollar asserts that in accordance with Section 33.013 of the Texas Civil Practice & Remedies Code, this Defendant may not be held jointly and severally liable for any amount of damages claimed herein unless the percentage of responsibility of this Defendant when compared with that of each responsible party, each settling person, and each responsible third party, is greater than fifty percent (50%).

**VI.**

Defendant Family Dollar alleges that Plaintiffs' claims for damages are barred in whole or in part, due to their failure to mitigate damages.

**VII.**

Defendant Family Dollar asserts that Plaintiffs' claims are barred in whole or in part in that Plaintiff Jackson's injuries and/or damages, if any, are the result, in whole or in part, of a preexisting and/or subsequent condition(s) and/or disability, and are not the result of any act and/or omission of this Defendant.

**VIII.**

Defendant Family Dollar invokes the limitation on liability for medical or health care expenses as provided by section 41.0105 of the Texas Civil Practice and Remedies Code.

Specifically, Plaintiff Jackson is limited to recovery of medical or health care expenses actually paid or incurred by or on behalf of Plaintiff Jackson, not to include amounts adjusted, discounted or written-off.

**IX.**

Defendant Family Dollar asserts that Plaintiff Jackson's damages with respect to loss of earnings and/or loss of earning capacity, if any, are limited to a net loss after reduction for income tax payments or unpaid tax liability pursuant to any federal income tax law, pursuant to section 18.091 of the Texas Civil Practice and Remedies Code.

**X.**

Defendant Family Dollar hereby invokes its entitlement to all definitions, instructions, defenses and limitations provided by Chapter 41 of the Texas Civil Practice and Remedies Code, including but not limited to, sections 41.003, 41.004, 41.005, 41.006, 41.007, 41.008, 41.009 and 41.012.

**XI.**

Defendant Family Dollar denies any alleged act or omission under the circumstances herein justify any claim for exemplary or punitive damages. Such claims as against Defendant Family Dollar are in violation of the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the United States Constitution, and Article 1, sections 3 and 19 of the Texas Constitution, in that such claims as made are arbitrary, unreasonable, and in violation of Defendant Family Dollar's rights to due process and equal protection of the law. Plaintiffs' claims are unconstitutionally vague to the extent that any claims of Plaintiffs against Defendant Family Dollar should be proven beyond a reasonable doubt under the 6<sup>th</sup> Amendment of the United States Constitution, as opposed to a mere clear and convincing evidence. Defendant Family Dollar further asserts that any claim for punitive

damages in a civil matter constitutes an excessive fine in violation of the 8<sup>th</sup> Amendment to the United States Constitution.

**XII.**

Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Defendant Family Dollar hereby places the parties to this suit on notice of its intent to use all documents produced by the parties in response to written discovery in all pretrial proceedings and/or at trial of the above-entitled and numbered cause.

**XIII.**  
**REQUEST FOR DISCLOSURE**

Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Defendant Family Dollar requests that Plaintiffs disclose the information set forth in items (a)-(l) of Rule 194.2 of the Texas Rules of Civil Procedure within thirty (30) days after service of this Request.

WHEREFORE, PREMISES CONSIDERED, Defendant Family Dollar prays that Plaintiffs take nothing by their suit, that Defendant Family Dollar recover all costs, and for such other and further relief to which Defendant Family Dollar may show itself to be justly entitled, both at law and in equity.

Respectfully submitted,

**KANE RUSSELL COLEMAN LOGAN PC**

By: /s/ *Kenneth C. Riney*  
Kenneth C. Riney  
State Bar No. 24046721  
E-Mail: [kriney@krcl.com](mailto:kriney@krcl.com)  
Clayton S. Carter  
State Bar No. 24120750  
E-Mail: [ccarter@krcl.com](mailto:ccarter@krcl.com)

901 Main Street, Suite 5200  
Dallas, Texas 75202  
Telephone: (214) 777-4200  
Facsimile: (214) 777-4299

**ATTORNEYS FOR DEFENDANT  
FAMILY DOLLAR STORES OF TEXAS, LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of foregoing has been served on the 12<sup>th</sup> day of January 2021, as follows:

**VIA E-SERVICE: [winston@linelawfirm.com](mailto:winston@linelawfirm.com)**  
Winston B. Line  
The Line Law Firm, PLLC  
4131 N. Central Expressway, Suite 932  
Dallas, Texas 75204

/s/ *Kenneth C. Riney*  
Kenneth C. Riney

**Automated Certificate of eService**

This automated certificate of service was created by the efilng system. The filer served this document via email generated by the efilng system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Vicki Sedon on behalf of Kenneth Riney  
Bar No. 24046721  
vsedon@krcl.com  
Envelope ID: 49630954  
Status as of 1/13/2021 10:56 AM CST

Associated Case Party: KATINA JACKSON

| Name           | BarNumber | Email                   | TimestampSubmitted   | Status |
|----------------|-----------|-------------------------|----------------------|--------|
| Winston B.Line |           | winston@linelawfirm.com | 1/12/2021 2:21:59 PM | SENT   |

Associated Case Party: FAMILY DOLLAR STORES OF TEXAS, LLC

| Name             | BarNumber | Email               | TimestampSubmitted   | Status |
|------------------|-----------|---------------------|----------------------|--------|
| LISA ENDTRICHT   |           | lendtricht@krcl.com | 1/12/2021 2:21:59 PM | SENT   |
| Vicki Sedon      |           | vsedon@krcl.com     | 1/12/2021 2:21:59 PM | SENT   |
| ASHLEY RIVERA    |           | arivera@krcl.com    | 1/12/2021 2:21:59 PM | SENT   |
| Kenneth C.Riney  |           | kriney@krcl.com     | 1/12/2021 2:21:59 PM | SENT   |
| Clayton S.Carter |           | ccarter@krcl.com    | 1/12/2021 2:21:59 PM | SENT   |

January 22, 2021

**By E-Filing**

Rhonda Pinson, Court Coordinator  
68<sup>th</sup> Judicial District Court  
Dallas County, Texas

Re: Cause No. DC-20-18451; *Katina Jackson vs. Family Dollar Stores of Texas, LLC, d/b/a Family Dollar Store d/b/a Family Dollar*; In the 68<sup>th</sup> Judicial District Court, Dallas County, Texas

Dear Ms. Pinson:

This correspondence will confirm payment of the Jury Fee in the above-referenced matter on behalf of Family Dollar Stores of Texas, LLC.

If you have any questions, please feel free to contact me.

Very truly yours,

**KANE RUSSELL COLEMAN LOGAN PC**

By: /s/ Clayton S. Carter  
Clayton Carter

CC/vs

cc via e-service:

Winston B. Line

**Dallas**  
901 Main Street  
Suite 5200  
Dallas, Texas 75202  
214.777.4200

**Houston**  
5051 Westheimer Road  
Suite 1000  
Houston, Texas 77056  
713.425.7400

8213877v1 (79656.00086.000)

**Automated Certificate of eService**

This automated certificate of service was created by the efilings system. The filer served this document via email generated by the efilings system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Vicki Sedon on behalf of Kenneth Riney  
Bar No. 24046721  
vsedon@krcl.com  
Envelope ID: 49931598  
Status as of 1/22/2021 11:16 AM CST

Associated Case Party: KATINA JACKSON

| Name           | BarNumber | Email                   | TimestampSubmitted   | Status |
|----------------|-----------|-------------------------|----------------------|--------|
| Winston B.Line |           | winston@linelawfirm.com | 1/22/2021 9:23:55 AM | SENT   |

Associated Case Party: FAMILY DOLLAR STORES OF TEXAS, LLC

| Name             | BarNumber | Email               | TimestampSubmitted   | Status |
|------------------|-----------|---------------------|----------------------|--------|
| LISA ENDTRICHT   |           | lendtricht@krcl.com | 1/22/2021 9:23:55 AM | SENT   |
| ASHLEY RIVERA    |           | arivera@krcl.com    | 1/22/2021 9:23:55 AM | SENT   |
| Kenneth C.Riney  |           | kriney@krcl.com     | 1/22/2021 9:23:55 AM | SENT   |
| Clayton S.Carter |           | ccarter@krcl.com    | 1/22/2021 9:23:55 AM | SENT   |
| Vicki Sedon      |           | vsedon@krcl.com     | 1/22/2021 9:23:55 AM | SENT   |

## Case Information

DC-20-18451 | KATINA JACKSON, et al vs. FAMILY DOLLAR STORES OF TEXAS, LLC, et al

|             |                     |                  |
|-------------|---------------------|------------------|
| Case Number | Court               | Judicial Officer |
| DC-20-18451 | 68th District Court | HOFFMAN, MARTIN  |
| File Date   | Case Type           | Case Status      |
| 12/15/2020  | PROPERTY            | OPEN             |

## Party

PLAINTIFF  
JACKSON, KATINA

Active Attorneys▼  
Lead Attorney  
LINE, WINSTON B.  
Retained

PLAINTIFF  
WIMBERLY, EUGENE

Active Attorneys▼  
Lead Attorney  
LINE, WINSTON B.  
Retained

DEFENDANT  
FAMILY DOLLAR STORES OF TEXAS, LLC

Aliases  
DBA FAMILY DOLLAR STORE  
DBA FAMILY DOLLAR  
Address

Active Attorneys▼  
Lead Attorney  
RINEY, KENNETH C  
Retained

BY SERVING ITS REGISTERED AGENT, CORPORATION  
SERVICE COMPANY  
211 E. 7TH STREET, SUITE 620  
AUSTIN TX 78701

DEFENDANT  
FAMILY DOLLAR

Address  
BY SERVING ANY OFFICER OR PERSON IN CHARGE  
4311 LIVE OAK ST  
DALLAS TX 75204

## Events and Hearings

12/15/2020 NEW CASE FILED (OCA) - CIVIL

12/15/2020 ORIGINAL PETITION ▾

ORIGINAL PETITION

12/15/2020 ISSUE CITATION ▾

FAMILY DOLLAR STORES OF TEXAS, LLC - ATTY

FAMILY DOLLAR - ATTY

12/21/2020 CITATION ▾

Served

12/23/2020

Anticipated Server

ATTORNEY

Anticipated Method

Actual Server

PRIVATE PROCESS SERVER

Returned  
12/30/2020  
Comment  
FAMILY DOLLAR

12/21/2020 CITATION ▾

Served  
12/31/2020

Anticipated Server  
ATTORNEY

Anticipated Method  
Actual Server  
OUT OF COUNTY

Returned  
01/11/2021  
Comment  
FAMILY DOLLAR STORES OF TEXAS, LLC

12/30/2020 RETURN OF SERVICE ▾

EXECUTED CITATION - FAMILY DOLLAR

Comment  
EXECUTED CITATION - FAMILY DOLLAR

01/11/2021 RETURN OF SERVICE ▾

EXECUTED CITATION: FAMILY DOLLAR STORES OF TEXAS, LLC

Comment  
EXECUTED CITATION: FAMILY DOLLAR STORES OF TEXAS, LLC

01/12/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾

ORIGINAL ANSWER - FAMILY DOLLAR STORES OF TEXAS LLC

01/22/2021 JURY DEMAND ▾

JURY DEMAND

## Financial

JACKSON, KATINA

|                            |          |
|----------------------------|----------|
| Total Financial Assessment | \$324.00 |
| Total Payments and Credits | \$324.00 |

|            |                           |          |
|------------|---------------------------|----------|
| 12/17/2020 | Transaction<br>Assessment | \$324.00 |
|------------|---------------------------|----------|

|            |                               |                               |                    |            |
|------------|-------------------------------|-------------------------------|--------------------|------------|
| 12/17/2020 | CREDIT CARD -<br>TEXFILE (DC) | Receipt # 78628-<br>2020-DCLK | JACKSON,<br>KATINA | (\$324.00) |
|------------|-------------------------------|-------------------------------|--------------------|------------|

FAMILY DOLLAR STORES OF TEXAS, LLC

|                            |         |
|----------------------------|---------|
| Total Financial Assessment | \$40.00 |
| Total Payments and Credits | \$40.00 |

|           |                           |         |
|-----------|---------------------------|---------|
| 1/22/2021 | Transaction<br>Assessment | \$40.00 |
|-----------|---------------------------|---------|

|           |                               |                              |                  |           |
|-----------|-------------------------------|------------------------------|------------------|-----------|
| 1/22/2021 | CREDIT CARD -<br>TEXFILE (DC) | Receipt # 4277-<br>2021-DCLK | FAMILY<br>DOLLAR | (\$40.00) |
|-----------|-------------------------------|------------------------------|------------------|-----------|

## Documents

ORIGINAL PETITION

FAMILY DOLLAR STORES OF TEXAS, LLC - ATTY

FAMILY DOLLAR - ATTY

EXECUTED CITATION - FAMILY DOLLAR

EXECUTED CITATION: FAMILY DOLLAR STORES OF TEXAS, LLC

ORIGINAL ANSWER - FAMILY DOLLAR STORES OF TEXAS LLC

JURY DEMAND

